

January 14, 2002

Mr. Michael Feagins
Eltek of Indiana, Inc.
1863 Lammens Pike
Batesville, Indiana 47006

Dear Mr. Feagins:

Re: Exempt Construction and Operation Status,
137-15333-00017

The application from Eltek of Indiana, Inc, received on December 27, 2001 has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following heat clean/pyrolytic ovens, located at 1863 Lammens Pike, Batesville, Indiana 47006, are classified as exempt from air pollution permit requirements. The source operation involves reclamation of coating line fixtures and parts with cured coating, which when cleaned up are return back to customers:

Proposed Emission Units and Pollution Control Equipment

- (1) One (1) natural gas-fired Heat Cleaning/Pyrolytic Oven, identified as HC-6196 with a maximum heat input capacity of 2.6 million British thermal units per hour (mmBtu/hr), with a maximum painted metal throughput of 100 pounds per hour, with an integral Direct-Flame Afterburner with a maximum heat input capacity of 1.53 mmBtu/hr and exhausting to stack #7.

Permitted Emission Units and Pollution Control Equipment

- (a) Two (2) natural gas-fired Heat Cleaning/Pyrolytic Ovens, each with a maximum heat input capacity of 0.7 mmBtu/hour, with maximum painted metal throughput of 80 pounds per hour each and exhausting to internal afterburners, with a maximum heat input capacity of 1.4 mmBtu/hour each and exhausting to two stacks.

The following conditions shall be applicable:

- (a) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (b) Pursuant to 326 IAC 4-2-2 the proposed natural gas-fired Heat Cleaning/Pyrolytic Oven, identified as HC-6196 with a maximum heat input capacity of 2.6 mmBtu/hr and the two existing natural gas fired Heat Cleaning/Pyrolytic Ovens, with a maximum heat input capacity of 0.7 mmBtu/hr each shall:

- (1) consist of primary and secondary chambers or the equivalent;
- (2) be equipped with a primary burner unless burning wood products;
- (3) comply with 326 IAC 5-1 and 326 IAC 2;
- (4) be maintained properly as specified by the manufacturer and approved by the commissioner;
- (5) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (6) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (7) be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (8) not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and
- (9) not create a nuisance or a fire hazard.

If any of the above result , the burning shall be terminated immediately.

This exemption is being re-issued to the source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

APD

cc: File - Ripley County
Ripley County Health Department
Air Compliance B D.J. Knotts
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Eltek of Indiana, Inc.
Source Location: 1863 Lammens Pike, Batesville, Indiana 47006
County: Ripley
SIC Code: 3449
Operation Permit No.: 137-12893-00017
Permit Reviewer: Aida De Guzman

The Office of Air Quality (OAQ) has reviewed an application from Eltek of Indiana relating to the construction and operation of the following heat clean/pyrolytic ovens. The source operation involves reclamation of coating line fixtures and parts with cured coating, which when cleaned up are returned back to customers:

Proposed Emission Units and Pollution Control Equipment

- (1) One (1) natural gas-fired Heat Cleaning/Pyrolytic Oven, identified as HC-6196 with a maximum heat input capacity of 2.6 million British thermal units per hour (mmBtu/hr), with a maximum painted metal throughput of 100 pounds per hour, with an integral Direct-Flame Afterburner with a maximum heat input capacity of 1.53 mmBtu/hr and exhausting to stack #7.

Permitted Emission Units and Pollution Control Equipment

- (a) Two (2) natural gas-fired Heat Cleaning/Pyrolytic Ovens, each with a maximum heat input capacity of 0.7mmBtu/hour, with maximum painted metal throughput of 80 pounds per hour each and exhausting to internal afterburners, with a maximum heat input capacity of 1.4 mmBtu/hour each and exhausting to two stacks.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 137-9480-00017, issued on March 4, 1998; and
- (2) Exemption 137-12893-00017, issued on January 4, 2001

The source which consists of existing permitted emission units together with a proposed emission unit is being re-permitted, pursuant to the new permitting rules 326 IAC 2.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
--	Oven/after burner	17	1.83	1555	1,600
--	Oven/after burner	17	1.83	1555	1,600
stack # 7	New Heat Cleaning/Pyrolytic Oven	25	1.66	2,965	1,400

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on December 27, 2001.

Emission Calculations

- (1) Proposed Heat Cleaning/Pyrolytic Oven:
 - (1) Cleaning/Pyrolysis Emissions: See Page 1 of 4 TSD Appendix A for detailed calculations.
 - (2) Natural Gas Combustion Emissions: See Page 2 of 4 TSD Appendix A for detailed calculations.
- (b) Existing Heat Cleaning/Pyrolytic Ovens:
 - (1) Cleaning/Pyrolysis Emissions: See Page 3 of 4 TSD Appendix A for detailed calculations
 - (1) Natural Gas Combustion Emissions: See Page 4 of 4 TSD Appendix A for detailed calculations

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.®

Pollutant	Potential To Emit (tons/year)
PM	4.0
PM-10	4.1
SO ₂	1.4
VOC	1.9
CO	7.3
NO _x	3.7

Justification for the Level of Approval

- (a) The existing source, which includes the proposed Heat Clean/Pyrolytic Oven will be issued an Exemption, pursuant to 326 IAC 2-1.1-3, since PM and PM10 are each emitted below 5 tons per year; and no other criteria pollutant is emitted at a rate of 10 tons per year, thresholds for a Registration.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Ripley County.

Pollutant	Status
TSP	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Ripley County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Ripley County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Potential To Emit (tons/year)
PM	4.0
PM-10	4.1
SO ₂	1.4
VOC	1.9
CO	7.3
NO _x	3.7

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This exemption is being re-issued to the source.

Federal Rule Applicability

- (a) New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (1) 40 CFR Part 60.50, Subpart E - Standards of Performance for Incinerators. This provisions apply to each incinerator of more than 45 metric tons per day charging rate (50 tons/day), that commences construction or modification after August 17, 1971.

This rule is not applicable to the heat clean/pyrolytic ovens, because they are not incinerators. Incinerators are defined as furnaces used in the process of burning solid waste for the purpose of reducing the volume of the waste by removing combustible matter.

Solid waste means refuse, more than 50 percent of which is municipal type waste consisting of a mixture of paper, wood, yard wastes, food wastes, plastics, leather, rubber and other combustible and noncombustible materials such as glass and rock.

- (2) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

- (a) 326 IAC 2-6 (Emission Reporting)
This source is located in Ripley County and the potential to emit any criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.
- (b) 326 IAC 5-1 (Visible Emissions Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Ter
 - (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

- (a) 326 IAC 4-2-2 (Incinerators: Requirements)
This rule applies to the Heat Clean/Pyrolytic Ovens operation. Pursuant to 326 IAC 4-2-2 (Incinerators: Requirements), the ovens shall:
 - (1) consist of primary and secondary chambers or the equivalent;
 - (2) be equipped with a primary burner unless burning wood products;
 - (3) comply with 326 IAC 5-1 and 326 IAC 2;
 - (4) be maintained properly as specified by the manufacturer and approved by the commissioner;
 - (5) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
 - (6) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
 - (7) be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
 - (8) not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and
 - (9) not create a nuisance or a fire hazard.

If
any
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ve

result, the burning shall be terminated immediately.

Based on condition 8 above, allowable PM emissions are:

Allowable PM = 0.5 pounds per one thousand (1,000) pounds of dry exhaust gas at standard conditions. As stated in the permit application the Manufacturer's guaranteed particulate emission rate complies with this limit. Therefore this operation will comply with 326 IAC 4-2-2.

Conclusion

The construction of the new heat clean/pyrolytic oven and operation of the existing heat clean/pyrolytic ovens shall be subject to the conditions of the attached Exemption 137-15333-00017.

**Appendix A: Emission Calculations
Incinerator**

Page 1 of 4 TSD App A

Company Name: Eltek of Indiana, Inc.
Address City IN Zip: 1863 Lammens Pike, Batesville, Indiana 47006
Exemption No.: 137-15333
Plt ID: 137-00017
Reviewer: Aida De Guzman
Date Application Received: December 27, 2001

THROUGHPUT
lbs/hr
100

New Heat Clean/Pyrolytic Oven

THROUGHPUT
ton/yr
438

	POLLUTANT				
	PM/PM10	SO2	CO	VOC	NOX
Emission Factor in lb/ton	7.0	2.5	10.0	3.0	3.0
Potential Emissions in ton/yr	1.5	0.5	2.2	0.7	0.7

Methodology

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers

Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Main Burners****Company Name:** Eltek of Indiana, Inc.**Address City IN Zip:** 1863 Lammens Pike, Batesville, Indiana 47006**Exemption No.:** 137-12893**Pit ID:** 137-00017**Reviewer:** Aida De Guzman**Date Application Received:** December 27, 2001Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

1.5

13.1

New Heat Clean/Pyrolytic Oven

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.0	0.0	0.0	0.7	0.0	0.6

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Emission Calculations
Incinerator**

Company Name: Eltek of Indiana, Inc.
Address City IN Zip: 1863 Lammens Pike, Batesville, Indiana 47006
Exemption No.: 137-15333
Plt ID: 137-00017
Reviewer: Aida De Guzman
Date Application Received: December 27, 2001

2 heat clean/pyrolytic ovens
@ 80 lb/hr throughput

THROUGHPUT
lbs/hr
160

THROUGHPUT
ton/yr
700.8

Emission Factor in lb/ton	POLLUTANT				
	PM/PM10	SO2	CO	VOC	NOX
	7.0	2.5	10.0	3.0	3.0
Potential Emissions in ton/yr	2.5	0.9	3.5	1.1	1.1

Methodology

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers

Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Page 4 of 4 TSD App A

Main Burners

Company Name: Eltek of Indiana, Inc.
Address City IN Zip: 1863 Lammens Pike, Batesville, Indiana 47006
Exemption No.: 137-15333
Pit ID: 137-00017
Reviewer: Aida De Guzman
Date Application Received: December 27, 2001

2 Heat Clean/Pyrolytic Ovens @
1.4 mmBtu/hr

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.8

24.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	**see below		
				1.2	0.1	1.0

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).